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August 6, 2021

VIA ECF

MEMO ENDORSED

The Honorable Andrew L. Carter, Jr.
United States District Court Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Mulligan v. Verizon New York Inc. et al*
1:17-cv-09390(ALC)(KNF)

Dear Judge Carter:

We represent Verizon New York Inc. ("Verizon") and James Melchione (collectively "Defendants") in the above-referenced matter. With Plaintiff's consent, we write to request a one week extension of the deadlines for all parties to file reply briefs with respect to the pending summary judgment motions in this case. All parties have filed summary judgment motions with a current reply deadline of August 10, 2021. One additional week is needed to complete replies, namely because Plaintiff submitted 172 additional Facts with his opposition briefing, and Defendants require the additional time to review and respond.

We therefore respectfully request the following modification to the summary judgment briefing schedule: all parties' reply briefs to be filed on or before August 17, 2021. Plaintiff consents to a mutual extension of these deadlines.

This is Defendants' first request for an extension of time for summary judgment briefing.

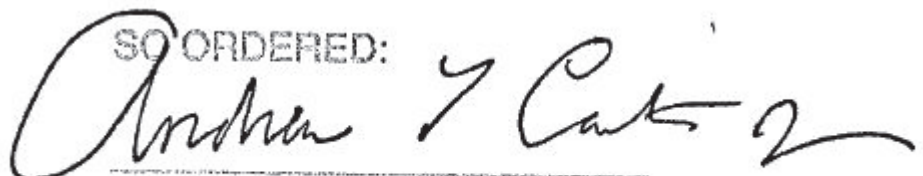
The proposed request is *de minimis* and will serve to productively advance this litigation. We thank Your Honor for your consideration of this request.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Howard M. Wexler

Howard M. Wexler

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

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CC: Counsel of Record (via ECF)